

Exhibit C

TRACY CAEKAERT, ET AL. V. WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., ET AL**CAUSE NO. 1:20-CV-00052-SPW; UNITED STATES DISTRICT COURT, FOR THE DISTRICT OF MONTANA, BILLINGS DIVISION*****ARIANE ROWLAND, ET AL. V. WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., ET AL*****CAUSE NO. 1:20-CV-00059-SPW; UNITED STATES DISTRICT COURT, FOR THE DISTRICT OF MONTANA, BILLINGS DIVISION****WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK INC'S FIRST SUPPLEMENTAL PRIVILEGE LOG**

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
Watchtower Legal Department Records							
1.	07/22/1992	Notes	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Bruce Mapley, Sr.	PDF	A/C
2.	07/22/1992 through 10/01/2019	Running series of Notes	Legal Department	None	Attorney/Paralegal Notes of Separate Calls with Congregations: Ashland, WI; Iron River, WI; Shawano, WI; Forsyth, MT; Hardin, MT; West Laurel, MT; Livingston, MT; Park Place, Oregon City, OR; Center Point, AL; Roebuck, Birmingham, AL. Re: Legal Advice concerning Bruce Mapley, Sr., and Martin Svenson	Lotus Notes PDF	A/C; TP
3.	07/22/1992 through 10/01/2019	Call Summaries	Legal Department	None	Attorney/Paralegal Notes of Separate Calls with Congregations: Iron River, WI; Shawano, WI; Forsyth, MT; Hardin, MT; Ashland, MT; West Laurel, MT; Livingston, MT; Park Place, Oregon City, OR; Center Point, AL; Roebuck, Birmingham, AL. Re: Legal Advice Bruce Mapley, Sr., and Martin Svenson	HuB PDF	A/C; TP

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4.	04/08/2020	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Roebuck, Birmingham, AL, Congregation. Re: Legal Advice concerning Bruce Mapley, Sr.	HuB PDF	A/C
5.	03/26/1994	Notes	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Martin Svenson, Nellie Means, David Means, and Third Parties [P.M., A.A., and M.R.]	PDF	A/C; TP
6.	03/26/1994 through 12/10/2018	Running series of Notes	Legal Department	None	Attorney/Paralegal Notes of Separate Calls with Congregations: Chamisa Taos, NM; Hardin, MT; Forsyth, MT; East Laurel, MT. Re: Legal Advice concerning Martin Svenson, Nellie Means, David Means, Bruce Mapley, Sr., and Third Parties [P.M., A.A., and M.R.]	Lotus Notes PDF	A/C; TP
7.	03/26/1994 through 12/10/2018	Call Summaries	Legal Department	None	Attorney/Paralegal Notes of Separate Calls with Congregations: Chamisa Taos, NM; Hardin, MT; Forsyth, MT; East Laurel, MT. Re: Legal Advice concerning Martin Svenson, Nellie Means, David Means, Bruce Mapley, Sr., and Third Parties [P.M., A.A., and M.R.]	HuB PDF	A/C; TP
8.	05/01/2020	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with West Laurel, MT, Congregation. Re: Legal Advice concerning Martin Svenson	HuB PDF	A/C

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
9.	05/07/2020	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with West Laurel, MT, Congregation. Re: Legal Advice concerning Martin Svenson	HuB PDF	A/C
10.	10/17/2019 and 12/13/2019	Running series of Notes	Legal Department	None	Attorney/Paralegal Notes of Calls with Hardin, MT Congregation. Re: Legal Advice concerning Gunnar Hain	Lotus Notes PDF	A/C; TP
11.	10/17/2019 and 12/13/2019	Call Summaries	Legal Department	None	Attorney/Paralegal Notes of Calls with Hardin, MT Congregation. Re: Legal Advice concerning Gunnar Hain	HuB PDF	A/C; TP
12.	08/05/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [A.A.]	HuB PDF	A/C; TP
13.	07/29/2019	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [J.C.]	HuB PDF	A/C; TP
14.	01/16/2006 through 10/09/2019	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [R.H.]	HuB PDF	A/C; TP
15.	08/05/2014 through 09/16/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Nellie Means	HuB PDF	A/C; TP
16.	08/05/2014 through 09/16/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [P.M.]	HuB PDF	A/C; TP

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17.	09/07/2015	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [A.M.]	HuB PDF	A/C; TP
18.	04/02/2021	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [R.M.]	HuB PDF	A/C; TP
19.	12/05/2003	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [J.N.]	HuB PDF	A/C; TP
20.	11/01/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [K.R.]	HuB PDF	A/C; TP
21.	05/24/2018 through 06/15/2018	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [M.R.]	HuB PDF	A/C; TP
22.	08/05/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party James Rowland	HuB PDF	A/C; TP
23.	04/23/2020	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [M.S.]	HuB PDF	A/C; TP
24.	08/05/2014	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Mildred Svenson	HuB PDF	A/C; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
25.	11/01/2014 through 09/07/2015	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [T.V.]	HuB PDF	A/C; TP
26.	09/07/2015	Call Summary	Legal Department	None	Attorney/Paralegal Notes of Call with Hardin, MT, Congregation. Re: Legal Advice concerning Third Party [C.W.]	HuB PDF	A/C; TP
Correspondence (March 14, 1997, BOE Letter Responses)							
27.	04/19/1997	Letter	C.F. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [C.R.]	PDF	CP; TP
28.	04/24/1997	Letter	H.P. Congregation	Service Department	Confidential communication Re: seeking or receiving religious guidance, admonishment, or advice concerning Third Party [B.M.]	PDF	CP; TP
29.	04/25/1997	Letter	Hardin Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party Gunnar Hain [This specific communication has already been reviewed <i>in camera</i> by this Court and determined to be protected under Montana's clergy-penitent privilege under § 26-1-804 (see Court's order dated July 30, 2021, Doc #82 at pp. 3-4)]	PDF	CP; TP

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30.	05/14/1997	Letter	E. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [M.C.]	PDF	CP; TP
31.	05/29/1997	Letter	L. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [L.J.]	PDF	CP; TP
32.	08/06/1997	Letter	T.B. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [G.J.]	PDF	CP; TP
33.	08/12/1997	Letter	B. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [T.M.]	PDF	CP; TP
34.	02/02/1999	Letter	E. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [N.O.]	PDF	CP; TP
35.	02/07/2000	Letter	Be. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [K.M.]	PDF	CP; TP
36.	04/06/2000	Letter	B.H. Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Third Party [R.G.]	PDF	CP; TP
Correspondence (Other)							
37.	09/15/1997	Letter	Hardin Congregation	Pacific WA Congregation	Confidential communication Re: Providing religious guidance, admonishment, or advice concerning Gunnar Hain	PDF	CP; TP

PL No.	Date	Document Type	Author(s)	Recipient	Description	Format	Privilege Asserted
38.	09/14/1998	Letter	Hardin Congregation	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Martin Svenson	PDF	CP; TP
39.	09/27/1999	Letter	Service Department	Hardin Congregation	Confidential communication Re: Providing religious guidance, admonishment, or advice concerning Gunnar Hain	PDF	CP; TP
40.	10/14/1999	Form	Canyon Ferry Congregation, Helena, MT	Service Department	Confidential communication Re: Seeking or receiving religious guidance, admonishment, or advice concerning Bruce Mapley, Sr.	PDF	CP; TP
41.	05/05/2011	Letter	Hardin Congregation	Legal Department	Letter seeking legal advice Re: Threat of legal action in relation to Bruce Mapley, Sr., Gunnar Hain, and Martin Svenson	PDF	A/C
42.	06/15/2011	Memorandum	Legal Department	Service Department	Attorney providing legal advice. Re: Bruce Mapley, Sr., Gunnar Hain, and Martin Svenson	PDF	A/C
43.	12/26/2014	Memorandum	Service Department	Legal Department	Memo seeking legal advice. Re: Bruce Mapley, Sr.	PDF	A/C
44.	01/02/2015	Memorandum	Legal Department	Service Department	Attorney providing legal advice. Re: Bruce Mapley, Sr.	PDF	A/C
Watchtower Legal Department Client Intake Forms							
45.	09/07/2014	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. Re: Seeking legal advice involving David Means and Nellie Means	PDF	A/C; TP
46.	09/07/2014	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. Re: Seeking legal advice involving David Means and Third Party [P.M.]	PDF	A/C; TP
47.	10/18/2019	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. Re: Seeking legal advice involving third party unrelated to this litigation [R.H.]	PDF	A/C; TP

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48.	10/18/2019	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. Re: Seeking legal advice involving third party unrelated to this litigation [R.H.]	PDF	A/C; TP
49.	04/30/2020	Client Intake Form	Hardin Congregation	Legal Department	Client seeking legal advice. Re: Legal issue involving third party unrelated to this litigation [M.S.]	PDF	A/C; TP

Key:

A/C = Attorney-Client Privilege

CP = Clergy-Penitent Privilege

TP = Third-Party Privacy

Date: May 2, 2022

Submitted by Brown Law Firm, P.C., on behalf of Defendant Watchtower Bible and Tract Society of New York, Inc.